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February 13, 2025

BY ECF

Honorable Joseph A. Marutollo
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Slade v. City of New York, et al.,
24-CV-6711 (NCM) (JAM)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and write on behalf of the City as an interested party in the above-referenced matter.¹ At the outset, the undersigned sincerely apologizes for failing to comply with Your Honor's Individual Rule IV regarding extension requests. The City writes to partially respond to the Court's Valentin order dated December 10, 2024 (ECF No. 11), and to respectfully request a thirty day extension of time, from February 14, 2025 to March 16, 2025, to complete its response. This is the second request for an extension of the Valentin deadline. The undersigned delayed filing this request to attempt to obtain Plaintiff's position, but was informed this morning that it would not be possible to arrange a legal call at Auburn Correctional Facility this week.

By way of background, Plaintiff brings claims under 42 U.S.C. § 1983 arising from, *inter alia*, his December 28, 2022 arrest by detectives from the 110th Precinct in Queens. The claims in this case were severed from a related case, Slade v. City of New York, 24 Civ. 514 (JMF), in the Southern District of New York and transferred to this Court. (ECF No. 7). By Order dated December 10, 2024, this Court dismissed several claims but ordered Corporation Counsel to identify two John Doe Detectives pursuant to Valentin v. Dinkins, 121 F.3d 72 (2d Cir. 1997).

¹ This case has been assigned to Assistant Corporation Counsel Jack McLaughlin, who is presently awaiting admission to the Eastern District of New York and is handling this matter under my supervision. Mr. McLaughlin may be reached directly at (212) 356-2670 or by email at jmclaugh@law.nyc.gov.

(ECF No. 11). The Court granted the City's first request for an extension until February 14, 2025. (ECF No. 13).

The City can now identify the primary detective who handled Plaintiff's arrest as Steven Gassick, who can be served at Nassau County Police Department, 1490 Franklin Avenue, Mineola, NY 11501.

However, despite diligent investigation, this office has been unable to identify the second John Doe detective. Thorough review of DD5s and other arrest-related documents has not revealed any other specific individual involved in the arrest. Our investigation into the Queens Robbery Squad indicates that detectives there do not maintain steady partners. Detective Gassick has informed us that he has no specific recollection of who was with him that day, explaining that it would have been whichever detective was available in the office. He further indicated that this second individual would have had minimal involvement, if any, potentially limited to transport assistance of the arrestee. Detective Gassick believes the records we have reviewed together are complete and that there are unlikely to be any additional documents that would identify the second John Doe detective.

Given the apparently limited nature of the second individual's involvement, the undersigned questions whether there are any cognizable claims against this defendant. Nevertheless, in our continued effort to fulfill our Valentin obligations, the undersigned has scheduled a call with Plaintiff for 9:30 a.m. on Wednesday, February 19, 2025. During this call, the undersigned hopes to obtain a physical description of the second John Doe that could assist in identification, either through further consultation with Detective Gassick or other detectives assigned to the Queens Robbery Squad on the date of incident.

Accordingly, the City respectfully requests a thirty-day extension, until March 14, 2025, to complete its investigation and attempt to identify the second John Doe detective.

The undersigned thanks the Court for its time and consideration of this request.

Respectfully Submitted,

Joseph Zangrilli /s/

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